

If you are a U.S.-based retail auto dealership that bought a Reynolds or CDK Dealer Management System (DMS) from January 1, 2015 through October 23, 2018, you could benefit from a class action settlement.

A settlement with The Reynolds and Reynolds Company has been reached in an antitrust class action lawsuit (the Dealership Class Action in *In re Dealer Management Systems Antitrust Litigation*, MDL No. 2817 (N.D. Ill.)) over the price of Dealer Management Systems (“DMS”) purchased from Reynolds and/or CDK Global, LLC during the period January 1, 2015 through October 23, 2018, including related vendor integration services. The lawsuit alleges CDK and Reynolds unlawfully colluded to force auto dealerships to pay more for DMS than they should have. Reynolds denies any wrongdoing and the Court has not ruled that Reynolds did anything wrong or violated any law. The Settlement is with Reynolds only; the litigation continues against CDK.

Who Is Included in This Settlement?

The “Dealership Class” means all persons and entities located in the United States engaged in the business of the retail sale of automobiles who purchased DMS from CDK and/or Reynolds, or any predecessor, successor, subsidiary, joint venture or affiliate, during the period from January 1, 2015 through October 23, 2018.

What Can You Get from the Settlement?

Reynolds will pay \$29,500,000 in cash into a Settlement Fund which, after any Court-approved fees and expenses, will be distributed to Dealership Class Members who submit valid claim forms at a later date.

How Can You Get a Settlement Payment?

There is no claims process at this time. Claim forms will be sent to Dealership Class Members at a later date. You should keep all documentation you have about your DMS purchases, including invoices paid to vendors, from January 1, 2015 through October 23, 2018 for use in a claim form later. Once this lawsuit is concluded against all Defendants, the Settlement Fund will be distributed based on the claim forms submitted by Dealership Class Members, subject to an allocation plan approved by the Court, upon further notice to the Dealership Class. You do not need to sign up with a claims recovery service to participate in the Settlement. No-cost claims filing assistance will be available from Dealership Class Counsel and the Settlement Administrator once claim forms become available. The settlement website www.dealershipclassDMSsettlement.com will display updated claims information. You may register your email address at www.dealershipclassDMSsettlement.com to receive email alerts of future notices, including the claim form when the claims process begins. Please keep your address current with the Settlement Administrator to help ensure delivery of future notices.

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What Are Your Rights and Options?

The Court will hold a Settlement Hearing on **January 22, 2019** at 10:00 a.m., and will consider whether to approve the Settlement and the request by the court-appointed lawyers for the Dealership Class (called “Dealership Class Counsel”) for up to \$3 million from the Settlement Fund in litigation expenses (including expert fees, deposition costs, and other expenses). Dealership Class Counsel are not seeking any attorneys’ fees or service awards for the plaintiffs at this time. The notification about the claims process will include information about any applications for litigation expenses above \$3 million, for attorneys’ fees, or for service awards for the plaintiffs. Any fee request will not exceed one-third of the amounts ultimately recovered on behalf of the Dealership Class.

If you are a Dealership Class Member and you don’t want to be eligible to receive a settlement payment, or don’t want to be legally bound by this Settlement, you must exclude yourself by **January 2, 2019**, or you won’t be able to sue, or continue to sue, Reynolds about the legal claims in this case. If you exclude yourself, you will not be eligible to receive a payment under this Settlement. If you remain a Dealership Class Member, you may object to the Settlement and/or the request for litigation expenses by **January 2, 2019**. The long-form notice, available at www.dealershipclassDMSsettlement.com, explains how to exclude yourself or object. You may appear at the Settlement Hearing, but you don’t have to. Dealership Class Counsel have been appointed to represent the Dealership Class. These attorneys are listed in the long-form notice. You may hire your own attorney to appear for you, but you will have to pay that attorney.

Where Can You Get More Information?

For more information, visit www.dealershipclassDMSsettlement.com, call 1-888-842-3161, or write to *Dealership Class Settlement—DMS Antitrust Litigation*, c/o Epiq, Settlement Administrator, P.O. Box 6727, Portland, OR 97228-6727. You can also contact Dealership Class Counsel: Peggy J. Wedgworth, Milberg Tadler Phillips Grossman LLP, One Pennsylvania Plaza, 19th Floor, New York, NY 10119, Tel: (212) 594-5300, pwedgworth@milberg.com; or Leonard A. Bellavia, Bellavia Blatt, PC, 200 Old Country Road, Suite 400, Mineola, NY 11501, Tel: (516) 873-3000, lbellavia@dealerlaw.com.

For More Information: 1-888-842-3161 or www.dealershipclassDMSsettlement.com